

ATTACHMENT

CTC-10

Bill Nbr	Cus Code	Circuit Id	USOC	Zone	Bill Date	Mile Rate	Rate Mile	Quantity	Rate	Amt	Discount	ServEstDate	ServChange
401M021348	174	85 HCGS 458766. NE	TMECS		20010322	0	0	1	266.42	266.42	0	19991228	20000701
401M021348	174	85 HCGS 458766. NE	1L5XX		20010322	50	24.88	4	149.52	149.52	0	19991228	20000701
401M021348	174	85 HCGS 465394. NE	1L5XX		20010322	50	24.88	3	124.64	124.64	0	19991229	20000701
401M021350	536	85 HCGS 443276. NE	1L5XX		20010304	50	24.88	12	348.56	348.56	0	19990916	20000701
401M021350	536	85 HCGS 443277. NE	1L5XX		20010304	50	24.88	3	124.64	124.64	0	19990915	20000701
401M021350	536	85 HCGS 445731. NE	1L5XX		20010304	50	24.88	27	721.76	721.76	0	19991001	20000701
401M021365	119	85 XHGS 626777. NE	TME4X		20010304	0	0	1	86.18	86.18	0	19990728	20000516
401M021365	119	85 XHGS 626777. NE	1L5XX		20010304	34.48	2.16	9	53.92	53.92	0	19990728	20000516
401M021369	585	4501 T3 PRVDRIODW01 PRVDRIWAK31	MQ3		20010304	0	0	1	755.2	755.2	0	19991116	20000518
401M021369	585	85 HCGS 479082. NE	TMECS		20010304	0	0	1	266.42	266.42	0	20000405	20000405
401M021369	585	85 HCGS 479082. NE	1L5XX		20010304	50	24.88	4	149.52	149.52	0	20000405	20000405
401M021369	585	85 HCGS 483678. NE	TMECS		20010304	0	0	1	266.42	266.42	0	20000317	20000701
401M021369	585	85 HCGS 483678. NE	1L5XX		20010304	50	24.88	24	647.12	647.12	0	20000317	20000701
401M021369	585	85 HCGS 502562. NE	TMECS		20010304	0	0	1	266.42	266.42	0	20000605	20000605
401M021369	585	85 HCGS 502562. NE	1L5XX		20010304	50	24.88	14	398.32	398.32	0	20000605	20000605
401M021369	585	85 HCGS 503780. NE	TMECS		20010304	0	0	1	266.42	266.42	0	20000802	20000801
401M021376	670	4502 T3 PRVDRIODW01 PRVDRIWAK31	MKM		20010304	0	0	1	755.2	755.2	0	20000207	20000516
401M021376	670	4503 T3 PRVDRIODW01 PRVDRIWAK31	MKM		20010304	0	0	1	755.2	755.2	0	20001012	20001012
401M021376	670	85 HCGS 507917. NE	TMECS		20010304	0	0	1	266.42	266.42	0	20000618	20000618
401M021376	670	85 HCGS 507917. NE	1L5XX		20010304	50	24.88	18	497.84	497.84	0	20000618	20000618
401M021376	670	85 HCGS 508247. NE	TMECS		20010304	0	0	1	266.42	266.42	0	20000621	20000621
401M021376	670	85 HCGS 508247. NE	1L5XX		20010304	50	24.88	5	174.4	174.4	0	20000621	20000621
401M021376	670	85 HCGS 521892. NE	TMECS		20010304	0	0	1	266.42	266.42	0	20000719	20000719
401M021376	670	85 HCGS 521892. NE	1L5XX		20010304	50	24.88	9	273.92	273.92	0	20000719	20000719
401M021376	670	85 HCGS 523925. NE	TMECS		20010304	0	0	1	266.42	266.42	0	20000821	20000821
401M021376	670	85 HCGS 523925. NE	1L5XX		20010304	50	24.88	9	273.92	273.92	0	20000821	20000821
401M021376	670	85 HCGS 540522. NE	TMECS		20010304	0	0	1	266.42	266.42	0	20000926	20000926
401M021376	670	85 HCGS 540522. NE	1L5XX		20010304	50	24.88	9	273.92	273.92	0	20000926	20000926
401M021376	670	85 HCGS 544274. NE	TMECS		20010304	0	0	1	266.42	266.42	0	20001227	20001227
401M021376	670	85 HCGS 544274. NE	1L5XX		20010304	50	24.88	3	124.64	124.64	0	20001227	20001227
401M021376	670	85 HCGS 556863. NE	TMECS		20010304	0	0	1	266.42	266.42	0	20001113	20001113
401M021376	670	85 HCGS 557970. NE	TMECS		20010304	0	0	1	266.42	266.42	0	20010111	20010111
401M021376	670	85 HCGS 557970. NE	1L5XX		20010304	50	24.88	24	647.12	647.12	0	20010111	20010111
401M021376	670	85 HCGS 557991. NE	TMECS		20010304	0	0	1	266.42	266.42	0	20001101	20001101
401M021376	670	85 HCGS 557991. NE	1L5XX		20010304	50	24.88	5	174.4	174.4	0	20001101	20001101
401M021376	670	85 HCGS 558387. NE	TMECS		20010304	0	0	1	266.42	266.42	0	20001122	20001122
401M021376	670	85 HCGS 558387. NE	1L5XX		20010304	50	24.88	10	298.8	298.8	0	20001122	20001122
401M021376	670	85 HCGS 558444. NE	TMECS		20010304	0	0	1	266.42	266.42	0	20001103	20001103
401M021376	670	85 HCGS 558444. NE	1L5XX		20010304	50	24.88	12	348.56	348.56	0	20001103	20001103
401M021376	670	85 HCGS 561515. NE	TMECS		20010304	0	0	1	266.42	266.42	0	20001113	20001113
401M021376	670	85 HCGS 561515. NE	1L5XX		20010304	50	24.88	14	398.32	398.32	0	20001113	20001113
401M021376	670	85 HCGS 561536. NE	TMECS		20010304	0	0	1	266.42	266.42	0	20001113	20001113
401M021376	670	85 HCGS 561536. NE	1L5XX		20010304	50	24.88	9	273.92	273.92	0	20001113	20001113
401M021376	670	85 HCGS 562004. NE	TMECS		20010304	0	0	1	266.42	266.42	0	20001115	20001115
401M021376	670	85 HCGS 562004. NE	1L5XX		20010304	50	24.88	9	273.92	273.92	0	20001115	20001115
401M021376	670	85 HCGS 568611. NE	TMECS		20010304	0	0	1	266.42	266.42	0	20001128	20001128
401M021376	670	85 HCGS 568611. NE	1L5XX		20010304	50	24.88	5	174.4	174.4	0	20001128	20001128
401M021376	670	85 HCGS 567176. NE	TMECS		20010304	0	0	1	266.42	266.42	0	20001204	20001204
401M021376	670	85 HCGS 567176. NE	1L5XX		20010304	50	24.88	3	124.64	124.64	0	20001204	20001204
401M021376	670	85 HCGS 568933. NE	TMECS		20010304	0	0	1	266.42	266.42	0	20001212	20001212
401M021376	670	85 HCGS 568933. NE	1L5XX		20010304	50	24.88	24	647.12	647.12	0	20001212	20001212
401M021376	670	85 HCGS 572897. NE	TMECS		20010304	0	0	1	266.42	266.42	0	20001215	20001215
401M021376	670	85 HCGS 572897. NE	1L5XX		20010304	50	24.88	12	348.56	348.56	0	20001215	20001215
401M021376	670	85 HCGS 583663. NE	TMECS		20010304	0	0	1	266.42	266.42	0	20010112	20010112
401M021376	670	85 HCGS 596660. NE	TMECS		20010304	0	0	1	266.42	266.42	0	20010228	20010228
401M021376	670	85 HCGS 596660. NE	1L5XX		20010304	50	24.88	10	298.8	298.8	0	20010228	20010228
401M021348	174	85 HCGS 447105. NE	TMECS		20010322	0	0	1	266.42	173.17	0.35	19991104	20000701
401M021348	174	85 HCGS 447105. NE	1L5XX		20010322	50	24.88	9	273.92	178.03	0.35	19991105	20001106

BHI Nbr	Cus Code	Circuit Id	USOC	Zone	Bill Date	Mile Rate	Rate Mile	Quantity	Rate	Amnt	Discount	ServEstDate	ServChange
401M021348	174	85 HCGS 451592 NE	TMECS		20010322	0	0	1	266 42	173 17	0 35	19991026	20000701
401M021348	174	85 HCGS 462933 NE	TMECS		20010322	0	0	1	266 42	173 17	0 35	19991220	20000701
401M021348	174	85 HCGS 462933 NE	1L5XX		20010322	50	24 88	9	273 92	178 03	0 35	19991220	20000701
401M021348	174	85 HCGS 465394 NE	TMECS		20010322	0	0	1	266 42	173 17	0 35	19991229	20000701
401M021348	174	85 HCGS 610207 NE	TMECS		20010322	0	0	1	266 42	173 17	0 35	20010321	20010321
401M021348	174	85 HCGS 610207 NE	1L5XX		20010322	50	24 88	24	647 12	420 58	0 35	20010321	20010321
401M021350	536	85 HCGS 372805 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	19990701	20000701
401M021350	536	85 HCGS 372805 NE	1L5XX		20010304	50	24 88	3	124 64	81 01	0 35	19990701	20000701
401M021350	536	85 HCGS 443258 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	19991021	20000701
401M021350	536	85 HCGS 443258 NE	1L5XX		20010304	50	24 88	38	995 44	646 96	0 35	19991022	20000813
401M021350	536	85 HCGS 443261 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	19990918	20000701
401M021350	536	85 HCGS 443261 NE	1L5XX		20010304	50	24 88	4	149 52	97 18	0 35	19990917	20000813
401M021350	536	85 HCGS 443262 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	19990918	20000701
401M021350	536	85 HCGS 443262 NE	1L5XX		20010304	50	24 88	9	273 92	178 03	0 35	19990917	20000813
401M021350	536	85 HCGS 443273 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	19990918	20000813
401M021350	536	85 HCGS 443273 NE	1L5XX		20010304	50	24 88	10	298 8	194 2	0 35	19990918	20000813
401M021350	536	85 HCGS 443275 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	19990930	20000701
401M021350	536	85 HCGS 443275 NE	1L5XX		20010304	50	24 88	10	298 8	194 2	0 35	19991001	20000813
401M021350	536	85 HCGS 443278 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	19990918	20000701
401M021350	536	85 HCGS 443277 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	19990915	20000701
401M021350	536	85 HCGS 445731 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	19991001	20000701
401M021369	585	85 HCGS 467544 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	20000110	20000701
401M021369	585	85 HCGS 467544 NE	1L5XX		20010304	50	24 88	4	149 52	97 18	0 35	20000111	20001106
401M021369	585	85 HCGS 468901 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	20000114	20000701
401M021369	585	85 HCGS 469105 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	20000119	20000701
401M021369	585	85 HCGS 469105 NE	1L5XX		20010304	50	24 88	9	273 92	178 03	0 35	20000119	20000701
401M021369	585	85 HCGS 472865 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	20000131	20000701
401M021369	585	85 HCGS 472865 NE	1L5XX		20010304	50	24 88	24	647 12	420 58	0 35	20000131	20000701
401M021369	585	85 HCGS 476444 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	20000217	20000701
401M021369	585	85 HCGS 476444 NE	1L5XX		20010304	50	24 88	5	174 4	113 35	0 35	20000217	20000701
401M021369	585	85 HCGS 479088 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	20000222	20000701
401M021369	585	85 HCGS 479088 NE	1L5XX		20010304	50	24 88	5	174 4	113 35	0 35	20000223	20000813
401M021369	585	85 HCGS 482403 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	20000321	20000701
401M021369	585	85 HCGS 482403 NE	1L5XX		20010304	50	24 88	5	174 4	113 35	0 35	20000322	20000814
401M021369	585	85 HCGS 485578 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	20000327	20000701
401M021369	585	85 HCGS 485608 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	20000324	20000814
401M021369	585	85 HCGS 485608 NE	1L5XX		20010304	50	24 88	5	174 4	113 35	0 35	20000324	20000814
401M021369	585	85 HCGS 486341 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	20000413	20000701
401M021369	585	85 HCGS 486341 NE	1L5XX		20010304	50	24 88	14	398 32	258 88	0 35	20000413	20000701
401M021369	585	85 HCGS 488133 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	20000331	20000701
401M021369	585	85 HCGS 491885 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	20000524	20000524
401M021369	585	85 HCGS 491885 NE	1L5XX		20010304	50	24 88	10	298 8	194 2	0 35	20000524	20000524
401M021369	585	85 HCGS 495620 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	20000510	20000701
401M021369	585	85 HCGS 502553 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	20000531	20000701
401M021369	585	85 HCGS 502553 NE	1L5XX		20010304	50	24 88	10	298 8	194 2	0 35	20000531	20000701
401M021369	585	85 HCGS 503702 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	20000531	20000701
401M021369	585	85 HCGS 504322 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	20000605	20000605
401M021369	585	85 HCGS 504322 NE	1L5XX		20010304	50	24 88	14	398 32	258 88	0 35	20000605	20000605
401M021369	585	85 HCGS 505582 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	20000608	20000608
401M021369	585	85 HCGS 505582 NE	1L5XX		20010304	50	24 88	18	497 84	323 56	0 35	20000608	20000608
401M021369	585	85 HCGS 505858 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	20001023	20001023
401M021369	585	85 HCGS 505858 NE	1L5XX		20010304	50	24 88	10	298 8	194 2	0 35	20001023	20001023
401M021369	585	85 HCGS 509964 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	20000622	20000622
401M021369	585	85 HCGS 509964 NE	1L5XX		20010304	50	24 88	10	298 8	194 2	0 35	20000622	20000622
401M021376	670	85 HCGS 516781 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	20001113	20001113
401M021376	670	85 HCGS 516925 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	20000718	20000718
401M021376	670	85 HCGS 516945 NE	TMECS		20010304	0	0	1	266 42	173 17	0 35	20000724	20000724
401M021376	670	85 HCGS 516945 NE	1L5XX		20010304	50	24 88	9	273 92	178 03	0 35	20000724	20000724

BNI Nbr	Cus Code	Circuit Id	USOC	Zone	BNI Date	Mile Rate	Rate Mile	Quantity	Rate	Amt	Discount	ServEstDate	ServChange
401M021378	670	85 HCGS 518783 NE	TMECS		20010304	0	0	1	266.42	173.17	0.35	20001214	20001214
401M021378	670	85 HCGS 518783 NE	1L5XX		20010304	50	24.88	3	124.64	81.01	0.35	20001214	20001214
401M021378	670	85 HCGS 520987 NE	TMECS		20010304	0	0	1	266.42	173.17	0.35	20000830	20000830
401M021378	670	85 HCGS 520987 NE	1L5XX		20010304	50	24.88	14	398.32	258.88	0.35	20000830	20000830
401M021378	670	85 HCGS 521231 NE	TMECS		20010304	0	0	1	266.42	173.17	0.35	20000718	20000718
401M021378	670	85 HCGS 521231 NE	1L5XX		20010304	50	24.88	2	99.76	64.84	0.35	20000718	20000718
401M021378	670	85 HCGS 528814 NE	TMECS		20010304	0	0	1	266.42	173.17	0.35	20000922	20000922
401M021378	670	85 HCGS 528814 NE	1L5XX		20010304	50	24.88	10	298.8	194.2	0.35	20000922	20000922
401M021378	670	85 HCGS 528810 NE	TMECS		20010304	0	0	1	266.42	173.17	0.35	20000825	20000825
401M021378	670	85 HCGS 528810 NE	1L5XX		20010304	50	24.88	10	298.8	194.2	0.35	20000825	20000825
401M021378	670	85 HCGS 533017 NE	TMECS		20010304	0	0	1	266.42	173.17	0.35	20001113	20001113
401M021378	670	85 HCGS 533017 NE	1L5XX		20010304	50	24.88	9	273.92	178.03	0.35	20001113	20001113
401M021378	670	85 HCGS 534187 NE	TMECS		20010304	0	0	1	266.42	173.17	0.35	20000911	20000911
401M021378	670	85 HCGS 534508 NE	TMECS		20010304	0	0	1	266.42	173.17	0.35	20000905	20000905
401M021378	670	85 HCGS 544932 NE	TMECS		20010304	0	0	1	266.42	173.17	0.35	20001127	20001127
401M021378	670	85 HCGS 544932 NE	1L5XX		20010304	50	24.88	14	398.32	258.88	0.35	20001127	20001127
401M021378	670	85 HCGS 544933 NE	TMECS		20010304	0	0	1	266.42	173.17	0.35	20001127	20001127
401M021378	670	85 HCGS 544933 NE	1L5XX		20010304	50	24.88	14	398.32	258.88	0.35	20001127	20001127
401M021378	670	85 HCGS 556876 NE	TMECS		20010304	0	0	1	266.42	173.17	0.35	20001122	20001122
401M021378	670	85 HCGS 556876 NE	1L5XX		20010304	50	24.88	14	398.32	258.88	0.35	20001122	20001122
401M910014	461	85 HCGS 443274 NE	TMECS		20010304	0	0	1	266.42	173.17	0.35	19991008	20000701
401M910014	461	85 HCGS 443274 NE	1L5XX		20010304	50	24.88	12	348.56	226.54	0.35	19991008	20000808
401M910017	949	85 HCGS 443281 NE	TMECS		20010304	0	0	1	266.42	173.17	0.35	19990923	20000701
401M910017	949	85 HCGS 443281 NE	1L5XX		20010304	50	24.88	24	647.12	420.58	0.35	19990924	20000808
401M910018	950	85 HCGS 443282 NE	TMECS		20010304	0	0	1	266.42	173.17	0.35	19990914	20000701
401M910018	950	85 HCGS 443282 NE	1L5XX		20010304	50	24.88	5	174.4	113.35	0.35	19990915	20000808
401M910019	951	85 HCGS 443283 NE	TMECS		20010304	0	0	1	266.42	173.17	0.35	19990922	20000701
401M910020	952	85 HCGS 443285 NE	TMECS		20010304	0	0	1	266.42	173.17	0.35	19990923	20000701
401M910020	952	85 HCGS 443285 NE	1L5XX		20010304	50	24.88	9	273.92	178.03	0.35	19990924	20000808
401M910023	883	85 HCGS 443286 NE	TMECS		20010304	0	0	1	266.42	173.17	0.35	19991019	20000701
401M910023	883	85 HCGS 443286 NE	1L5XX		20010304	50	24.88	18	497.84	323.56	0.35	19991020	20000808
401M910028	955	85 HCGS 443375 NE	TMECS		20010304	0	0	1	266.42	173.17	0.35	19990924	20000701
401M910028	955	85 HCGS 443375 NE	1L5XX		20010304	50	24.88	9	273.92	178.03	0.35	19990925	20000808
401M910028	956	85 HCGS 443386 NE	TMECS		20010304	0	0	1	266.42	173.17	0.35	19990916	20000701
401M910028	956	85 HCGS 443386 NE	1L5XX		20010304	50	24.88	9	273.92	178.03	0.35	19990917	20000809
401M021369	585	4501 T3 PRVDRIODW01 PRVDRIWAK31	TYFMX		20010304	0	0	1	1815	1089	0.4	19991116	20010224
401M021378	670	4502 T3 PRVDRIODW01 PRVDRIWAK31	TYFMX		20010304	0	0	1	1815	1089	0.4	20000207	20010224
401M021378	670	4503 T3 PRVDRIODW01 PRVDRIWAK31	TYFMX		20010304	0	0	1	1815	1089	0.4	20001012	20010224
										\$ 38,628.31			

EXHIBIT 3

Verizon Supplemental Checklist Declaration (Nov. 9, 2001)

STATE OF VERMONT
PUBLIC SERVICE BOARD

Verizon New England Inc., d/b/a
Verizon Vermont, Section 271 of
the Telecommunications Act of 1996
Compliance Filing

Docket No. 6533

SUPPLEMENTAL CHECKLIST DECLARATION

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STATE OF VERMONT
PUBLIC SERVICE BOARD

SUPPLEMENTAL CHECKLIST DECLARATION

THE DECLARANTS

1. My name is Donald E. Albert. My business address is 600 East Main Street, Richmond, Virginia. I am employed by Verizon as a Director -- Competitive Local Exchange Carrier Implementation. My responsibilities and background were set forth in the Checklist Declaration filed on August 7, 2001, in this Docket.
2. My name is Peter J. D'Amico. My business address is 416 7th Avenue, Pittsburgh, Pennsylvania. I am employed by Verizon Services Corp., as a Senior Specialist in the Interconnection Product Management Group. My responsibilities were set forth in the Checklist Declaration filed on August 7, 2001, in this Docket.
3. My name is Maureen Davis. My business address is 13100 Columbia Pike, Silver Spring, Maryland. My title is Executive Director -- National CLEC Maintenance Centers. My responsibilities were set forth in the Checklist Declaration filed on August 7, 2001, in this Docket.
4. My name is Margaret H. Detch. My office is located at 125 High Street, Boston, Massachusetts. I am employed by Verizon as a Senior Specialist with product management responsibility for Unbundled Dark Fiber. My responsibilities and

background were set forth in the Checklist Declaration filed on August 7, 2001, in this Docket.

5. My name is Joanne Fenoff. My office is located at 800 Hinesburg Road, South Burlington, Vermont. I am employed by Verizon as Director of Regulatory Affairs for Vermont. My responsibilities and background were set forth in the Checklist Declaration filed on August 7, 2001, in this Docket
6. My name is Gloria L. Harrington. My business address is 125 High Street, Boston, Massachusetts. I am employed by Verizon Services Corp. as Manager -- Facilities Management. My responsibilities and background were set forth in the Checklist Declaration filed on August 7, 2001, in this Docket.
7. My name is Karen Maguire. My business address is 1095 Avenue of the Americas, New York, New York. I am employed by Verizon as Executive Director-Customer Infrastructure Program Management. I am responsible for project managing the implementation of large networks for Wholesale customers, including CLECs, and working with them to implement network infrastructure including collocation and entrance facilities. I also have responsibility for various aspects of collocation billing.
8. My name is Thomas Maguire. My business address is 1095 Avenue of the Americas, New York, New York. I am employed by Verizon as a Vice President in the Network Services Group. My responsibilities and background were set forth in the Checklist Declaration filed on August 7, 2001, in this Docket.
9. My name is John Ries. My business address is 600 Hidden Ridge Boulevard, Irving, Texas. I am employed by Verizon as a Program Manager -- Access

Services. My responsibilities and background were set forth in the Checklist Declaration filed on August 7, 2001, in this Docket.

10. My name is Richard Rousey. My business address is 600 Hidden Ridge Boulevard, Irving Texas. I am employed by Verizon as a Product Manager for unbundled sub loops. My responsibilities and background were set forth in the Checklist Declaration filed on August 7, 2001, in this Docket.

PURPOSE OF SUPPLEMENTAL CHECKLIST DECLARATION

11. This Supplemental Checklist Declaration is filed on behalf of Verizon New England Inc., d/b/a Verizon Vermont ("Verizon VT") to respond to the Declarations of David Brevitz, Bion Ostrander and Christopher Campbell on behalf of the Department of Public Service ("Department"), and CTC Communications Corp., on October 15, 2001. This Declaration demonstrates that, contrary to CTC's claims, Verizon VT's collocation practices and procedures are in compliance with its collocation tariffs, the Telecommunications Act of 1996 ("Act"), and Checklist Item 1 of Section 271 of the Act. In response to comments submitted by Mr. Ostrander and Mr. Campbell regarding Checklist Items 2 and 4, this Declaration demonstrates that Verizon VT's rates for access to unbundled network elements and ancillary services are TELRIC compliant and further that Verizon VT provides appropriate information to CLECs in support of its unbundled subloop offering. This Declaration also shows that, contrary to CTC's assertions, Verizon VT's dark fiber offering meets its obligations under Checklist Items 2, 4 and 5. In addition, this Declaration responds to issues raised in the Declaration of Charles Larkin on behalf of the Department regarding Checklist Item 3. Finally, this Declaration explains that reciprocal compensation billing disputes between two parties should be handled outside of Verizon VT's 271 proceeding and are not relevant to its obligations under Checklist Item 13.
12. Because no participants in this proceeding, other than the Department or CTC, filed comments regarding Verizon VT's compliance with Checklist Items 6, 7, 8,

9, 10, 11, 12 and 14, Verizon VT is not submitting supplemental comments on those items.

CHECKLIST ITEM 1: INTERCONNECTION

13. Verizon VT demonstrated in its Checklist Declaration, ¶¶ 23-96, that it has satisfied its obligations under Checklist Item 1. The Department agrees. *See* Brevitz Declaration at 5. Only one other party, CTC Communications, filed comments regarding Verizon VT's performance under Checklist Item 1. CTC's comments were limited to only one area under this Checklist item.

A. Collocation

14. CTC alleges that "Verizon's practices regarding a CLEC's termination and turnover of collocation space arrangements and related billing do not comport with its tariffs, the Act and Competitive Checklist Item 1." CTC Declaration at 4. CTC complains that Verizon VT has "improperly continued to demand payment for non-recurring charges" for CTC's collocation arrangements that it states were "never accepted" by CTC in Verizon VT's central offices at 29 Gates Street in White River Junction, and at West Allen Street in Winooska [sic]."¹ *Id.* at 5. CTC claims that Verizon VT has failed to "follow the instructions outlined in its own Schedule Letters to CTC" and to follow procedures set forth in its FCC Tariff No. 11 that "trigger a CLEC's liability for such charges." *Id.* at 5, 6.
15. Contrary to CTC's claims, Verizon VT's collocation procedures are in compliance with the requirements of FCC Tariff No. 11, which is the tariff under which CTC ordered its collocation arrangements in White River Junction and Winooski, and fully comply with all requirements of the Act and Checklist Item 1.

¹ CTC erroneously refers to its collocation arrangement in Verizon VT's central office in Winooski as Winooska.

completion of Verizon's work on CTC's collocation arrangement. A copy of the schedule letter sent to CTC for its arrangement in Winooski is provided as Attachment C to this Declaration.

25. CTC claims that "Verizon's [sic] continues to attempt to impose these non-recurring charges despite Verizon's failure to follow the instructions outlined in its own Schedule Letters to CTC" CTC adds that Verizon VT "has attempted to impose these non-recurring charges despite the fact that no construction work was ever performed to construct collocation cages in the terminated collocation arrangements." It further adds that "[s]ince no cage was built, this work [*i.e.*, installation of a ground bar] could not have been completed. Accordingly, Verizon is not entitled to recover non-recurring charges related to this and other work that was never completed." CTC Declaration at 5, 6.
26. CTC ordered its physical collocation arrangement in Winooski under the FCC No. 11 Tariff, therefore CTC, not Verizon VT, was obligated to construct its own physical collocation cage in this arrangement. *See* FCC No. 11 Tariff, Sections 28.1.3(E) and 28.3.1(C). The failure of CTC to construct a cage for its arrangement in Winooski, to which a ground bar would have been affixed by Verizon VT, has absolutely nothing to do with the other work Verizon VT performed for CTC to provision its collocation arrangement. This work included, but was not limited to, providing associated power system support and cabling, and installing the Point of Termination ("POT") Bay. Except for installation of a ground bar, which Verizon VT was not able to install as noted above, Verizon VT's work on CTC's collocation arrangement in Winooski was complete.

27. Verizon VT sent a Collocation Acceptance Meeting (“CAM”) notification letter to CTC on April 27, 2000, for its collocation arrangement in Winooski. The letter informed CTC that its arrangement was “scheduled to be completed shortly” in accordance with the date Verizon VT had specified in the schedule letter and requested that CTC “contact [Verizon] to schedule a Collocation Acceptance Meeting” As noted earlier in this Declaration, CAMs enable CLECs to inspect their arrangements, if they choose, to verify that Verizon VT had completed its work on the arrangement, and accept the arrangement. A copy of the CAM letter sent by Verizon VT to CTC for its arrangement in Winooski is provided as Attachment D to this Declaration.
28. After the schedule letter and the CAM letter were sent by Verizon VT, CTC provided no response and did not request that Verizon VT discontinue work on the collocation arrangement in Winooski. As a result, Verizon VT completed CTC’s arrangement in Winooski on May 12, 2000. Verizon VT completed the arrangement on time and in accordance with the date specified by Verizon VT in the schedule letter that it sent to CTC.
29. CTC never responded to the CAM notification letter sent by Verizon VT for CTC’s arrangement in Winooski, and never contacted Verizon VT to inspect or otherwise arrange for access to this arrangement to verify that Verizon VT had completed it.
30. CTC is familiar with the purpose and importance of the CAM process, since it scheduled and completed CAMs with Verizon VT for three collocation arrangements in Vermont, including CTC's arrangement in White River Junction.

31. CTC sent a termination notice to Verizon VT for CTC's collocation arrangement in Winooski on December 19, 2000 – a full seven months after Verizon VT finished its work on CTC's arrangement in this office, and nearly eight months after Verizon VT notified CTC in April 2000 about scheduling a CAM.
32. As with the work involved in provisioning CTC's collocation arrangement in White River Junction, Verizon VT incurred substantial costs to provision CTC's collocation arrangement in Winooski. Contrary to CTC's claims, Verizon VT appropriately has attempted to recover these costs in accordance with the terms and conditions of FCC Tariff No. 11.
33. Verizon VT billed CTC for the remaining 50% of the nonrecurring charges for its arrangement in Winooski in accordance with the requirements of Section 28.3.1(C) of FCC Tariff No. 11. The tariff entitled Verizon VT to bill CTC for these charges after 30 days had elapsed from the time Verizon VT completed its work on CTC's arrangement. As noted above, Verizon VT made a good faith effort to conduct a CAM with CTC, at which point Verizon VT was prepared to *grant occupancy* or *provide access* to the collocation arrangement in Winooski that Verizon VT had provisioned at CTC's request.
34. Section 28.3.1(D) of FCC Tariff No. 11 states that "If a customer withdraws its request [for collocation], the customer is responsible for any nonrecurring costs incurred by the Telephone Company on behalf of the customer." Because CTC did not withdraw its request until after Verizon VT had completed its work, Verizon VT is entitled to rely on this provision of the tariff to seek recovery of the

nonrecurring costs it incurred to provision the collocation arrangement for CTC in Winooski.

35. CTC's complaints amount to little more than an attempt to avoid its financial responsibilities to pay Verizon VT for work it performed to provision CTC's collocation arrangement in Winooski. Certainly, nothing in this history indicates that Verizon VT is failing to comply with its collocation obligations under the Act.
36. On page 7 of its Declaration, CTC complains that Verizon "has also refused CTC's requests to provide any form of supporting documentation" demonstrating that Verizon VT "completed" the arrangement in Winooski or incurred any costs to do so.
37. When it submitted its termination notice to Verizon VT on December 19, 2000, identifying Winooski as a collocation site it wanted to "turn back," CTC relinquished any claim it had to that collocation arrangement, as well as any associated right to obtain documentation for or gain access to this arrangement.
38. CTC waited until July 10, 2001, approximately 14 months after Verizon VT actually completed CTC's arrangement in Winooski, and nearly seven months after CTC terminated this arrangement, to formally request a tour of the arrangement. CTC's indignation over Verizon VT's refusal to provide documentation for this arrangement is hard to credit given that it was CTC that chose not to schedule a CAM or otherwise arrange to inspect or access its arrangement prior to terminating it. And, it was CTC that chose to terminate or "turn back" the arrangement to Verizon VT. Verizon VT should not be expected

to provide CTC or other CLECs with documentation for or access to a collocation arrangement beyond the effective date of a cancellation or termination notice. CTC had ample opportunity prior to terminating the collocation arrangement in Winooski to inspect the arrangement and review related documentation [*i.e.*, a CAM form like the one it reviewed and signed for its arrangement in White River Junction] but chose not to do so. It is not reasonable for CTC to demand documentation for this arrangement months after notifying Verizon VT that it was relinquishing any claim to the arrangement.

39. As noted above, CTC would have reviewed “supporting documentation” from Verizon VT regarding the “design, engineering and construction” of CTC's collocation arrangement in Winooski (as it did for its arrangement in White River Junction) at a CAM which, as noted above, CTC failed to schedule prior to terminating its arrangement in Winooski. This documentation is comprised of a Collocation MOP Form or CAM form that Verizon VT would have reviewed with CTC at the CAM to document that Verizon VT provisioned CTC's arrangement in Winooski according to its specifications and requirements. The CAM form contains a wide range of detailed information such as the size of a CLEC's physical collocation arrangement and a CLEC's cabling, as well as DC power, heating, ventilation, air conditioning; and lighting requirements. Verizon VT did not have an opportunity to complete a CAM form for CTC's arrangement in Winooski because CTC never contacted Verizon VT to schedule a CAM.
40. CTC also complains that Verizon VT continued to bill recurring charges for one additional month for CTC's collocation arrangement in Winooski. In particular,

CTC states that Verizon “improperly seeks to impose these monthly recurring charges through January 17, 2001” after CTC sent a termination notice to Verizon on December 19, 2000, for CTC’s collocation arrangement in Winooski. CTC Declaration at 8.

41. Under Section 28.9.12. of FCC Tariff No. 11, CTC was required to provide Verizon VT “[s]ixty (60) days’ prior written notice to the Telephone Company” when terminating its “multiplexing node(s) or portion thereof [*i.e.*, collocation arrangements], roof space, transmitter/receiver space, cable and conduit, and D.C. power... .” CTC provided no such notice for its arrangement in Winooski. Instead, CTC incorrectly insists that Verizon VT must make CTC’s termination notice effective the day Verizon VT received it (*i.e.*, December 19, 2000) and cease billing as of that date. CTC’s claim is inconsistent with the terms of FCC Tariff No. 11 and unreasonable. Verizon VT’s practice is to cease billing for collocation arrangements 30 days after receiving a termination notice in those instances where there is no CLEC equipment in place in an arrangement. Had CTC provided Verizon VT with the proper 60-day advance notification (*i.e.*, by October 19, 2000) as required by FCC Tariff No. 11, Verizon VT would have had sufficient time within the subsequent 60-day interval to process CTC’s request and terminate billing for CTC’s arrangement in Winooski.
42. CTC also complains that Verizon VT has notified CTC that it “intends to back bill CTC in New York, Vermont and other states for monthly recurring charges for voice grade loop terminations associated with collocation arrangements ordered

under FCC Tariff No. 11, even though this tariff does not contain any such charges.” CTC Declaration at 17, 18.

43. CTC is wrong on the facts. The “back bill” plan to which CTC refers applies to New York; Verizon has not stated an intent or a need to expand the plan to Vermont. There simply is no issue here that relates to Verizon VT’s compliance with any Checklist requirement.
44. CTC’s complaints regarding Verizon VT’s collocation policies and practices clearly do not establish any failure of Verizon VT to comply with any requirement of the FCC, the Act, or Checklist Item 1.

CHECKLIST ITEM 2: NONDISCRIMINATORY ACCESS TO UNBUNDLED NETWORK ELEMENTS

45. Verizon VT demonstrated in its Checklist Declaration, ¶¶ 97-106, that it has satisfied its obligations under Checklist Item 2. Only the Department’s witness, Bion Ostrander, filed comments regarding Verizon VT performance under Checklist Item 2. Mr. Ostrander’s declaration was limited to non-recurring DSL pricing and OSS issues related to wholesale billing and to line loss reports. Verizon VT addresses Mr. Ostrander’s comments regarding OSS issues in the Supplemental OSS Declaration. This declaration responds to Mr. Ostrander’s comments regarding Verizon’s nonrecurring DSL rates.
46. Mr. Ostrander alleges that Verizon’s non-recurring rates associated with DSL-capable loops are “unusually high when compared to other Verizon states and that the Board should examine the underlying causes of these differences.” Ostrander Declaration at 3-4. Mr. Ostrander asserts that “... evidence indicates that these

DSL nonrecurring rates may be acting as a barrier to competitive entry for DSL service in Vermont.” *Id.* at 6. Mr. Ostrander then attempts to support his assertions by comparing certain non-recurring loop qualification and loop conditioning rates, as well as UNE volumes in Vermont, with rates and volumes in other states. *Id.* at 7-10. As explained below, Mr. Ostrander’s analyses and conclusions are without merit.

47. First, as Verizon VT makes clear in its response to DPS 1-86, a comparison of UNE rates, as requested by the Department and selectively used in Mr. Ostrander’s declaration, does not provide information that is probative of any issue in this proceeding. Mr. Ostrander goes to some length, however, to justify his loop qualification and loop conditioning nonrecurring rate comparison, citing FCC precedent in previous ILEC 271 proceedings as evidence of the appropriateness of his approach. Mr. Ostrander fails to point out, however, that the FCC only has compared recurring unbundled loop and switch port rates where it has determined the state commission may have erred in its application of TELRIC principles. Furthermore, when the FCC conducts its rate comparisons, it considers relative recurring costs that exist between states based on its Hybrid Cost Proxy Model (“HCPM”). In fact, the HPCM does not consider nonrecurring costs at all, which are the type of costs that Mr. Ostrander compares in his declaration.³

³ If the FCC were to conduct the type of analysis it conducted in its *Massachusetts 271 Approval Order*, it would not compare recurring unbundled loop and switch port rates in Vermont with those rates in New York on an absolute basis. Rather, the FCC would compare the differences in loop rates between Vermont and New York based on the differences in costs between the two states as predicted by the HCPM to determine if the rate difference was within a reasonable range. Under this analysis, Verizon VT estimates that the FCC’s HCPM would place unbundled loop and

48. Second, although Verizon VT does not believe a comparison of rates among states is probative of any issue in this Board's review of Verizon VT's 271 application, Verizon VT recently supplemented its response to DPS 1-86 with the loop qualification and conditioning charges that presently apply in Maine, Delaware and West Virginia. The additional information provided in Verizon VT's supplemental response to DPS 1-86 demonstrates that Verizon VT's rates are comparable to the effective rates in New Hampshire and Maine. Verizon VT's supplemental data also confirms the fact that Verizon VT's rates are comparable to those in Delaware and West Virginia.⁴
49. Third, even if Verizon VT's rates for loop qualification and conditioning services were "excessive" – which they are not – Mr. Ostrander's analysis is overly simplistic and offers no explanation of why non-affiliated CLECs are or are not entering the DSL market in Vermont. At best, Mr. Ostrander provides only circumstantial evidence to support his contention that less than a dozen non-recurring rates (associated with ancillary DSL services) explain why competitors are or are not entering the DSL market in Vermont.
50. Moreover, Mr. Ostrander apparently does not understand or simply chooses to ignore the fact that Verizon's affiliate, Verizon Advanced Data, Inc. ("VADI"), obtains access to Verizon VT's network on an unbundled basis on similar terms, conditions and rates as other CLECs. Indeed, there is no difference whatsoever in

switch port rates in Vermont within 194% of Verizon NY's unbundled loop and switch port rates, which the FCC found were TELRIC compliant in its *New York 271 Approval Order*. Verizon VT's recurring rates for unbundled loops and switch ports fall well within this range, as can be seen in Verizon VT's response to DPS 1-86.

⁴ The Department's response to Verizon Information Request No. 19 indicates Mr. Ostrander may have misinterpreted Verizon's data regarding rates for Delaware and West Virginia.

the rates VADI pays versus the rates non-affiliated CLECs pay for access to Verizon VT's unbundled network elements and ancillary services.

51. Additionally, Mr. Ostrander apparently does not understand or chooses to ignore the fact that the ancillary services identified in Table BCO-1 in paragraph 9 of Mr. Ostrander's Declaration are services that are requested only in limited circumstances. Indeed, CLECs infrequently request a manual loop qualification⁵ or engineering query from Verizon VT for a loop served from a central office where the CLEC has collocated its DSLAM (Digital Subscriber Line Access Multiplexer) equipment. This is because information a CLEC needs to determine whether a loop is DSL capable already is available in Verizon's mechanized loop qualification database. As of October 2001, the prequalification process had been performed in all 25 of the Verizon wire centers that had a collocation arrangement. While these offices are only 30% of the Verizon VT Wire Centers they serve 68% of all the Verizon VT loops. In all, Verizon's database includes information on approximately 70% of all Verizon VT loops. Therefore, today a CLEC that has collocated DSLAM equipment at a particular central office can access Verizon's mechanized loop qualification system and determine whether a loop serving a particular customer location is DSL capable. And, a CLEC pays absolutely nothing to prequalify a loop using Verizon's mechanized loop

⁵ Over the period June through August 2001, Verizon VT processed 34 requests for manual loop qualifications for CLECs or approximately 10 manual loop qualifications per month. In contrast, over the period June through August 2001, CLECs completed 4,196 mechanized loop pre-qualifications or approximately 1,400 mechanized loop pre-qualifications per month. See PO-1-06 (Facility Availability-Loop Qualification) in Verizon VT's Carrier-to-Carrier Reports.

qualification system.⁶ Thus, a CLEC wishing to serve the DSL market in Vermont therefore can obtain the requisite loop qualification information from Verizon's mechanized system and use that information to decide whether to offer DSL service in an entire central office area or to a particular customer location - without incurring any of the ancillary charges shown on Mr. Ostrander's exhibit.

52. Furthermore, Mr. Ostrander's comparison of UNE volumes among various states adds nothing to support his unfounded claims. If Mr. Ostrander's assertions were correct, many CLECs would have submitted testimony on the matter similar to Mr. Ostrander's. Yet, no CLEC has done so. This is an excellent and significant indication that Verizon VT's rates for loop qualification and conditioning services -- such as its recurring and non-recurring rates for other UNEs -- comply with this Board's approved TELRIC methodology and satisfy the requirements of Checklist Item 2.
53. Moreover, it is disingenuous of Mr. Ostrander to assert that Verizon VT's rates for certain loop qualification or loop conditioning services are functioning as a barrier to competitive entry. The telecommunications market in Vermont is much more complex than Mr. Ostrander's simple "analysis" would suggest. Mr. Ostrander's Declaration offers no facts or evidence whatsoever to support his contention that Verizon VT's rates for loop qualification and loop conditioning services function as a barrier to competitive entry for DSL service in Vermont

⁶ Verizon VT assesses a recurring mechanized loop qualification charge only on orders for unbundled xDSL loops and line shared loops -- and not when a CLEC uses the system to prequalify a loop that does not lead to an order.

and, therefore, it should be dismissed by this Board. Accordingly, this Board should find that Verizon VT easily satisfies the requirements of Checklist Item 2.

CHECKLIST ITEM 3: POLES, DUCTS, CONDUITS AND RIGHTS-OF-WAY

54. As noted in Mr. Larkin's Reply Declaration that was filed on behalf of the Department (hereinafter "the Larkin Declaration"), Verizon VT filed its amended pole attachment tariff, P.S.B. VT No. 26 (the "Tariff") on August 3, 2001, so as to comply with the directive of P.S.B. Rule 3.703(B), and subsequently filed a revision to the amendments on October 2nd solely to change the effective date of the Tariff pursuant to the Board's Order of September 13, 2001, in P.S.B. Docket 6553. In its Reply Declaration, the Department identified a variety of issues primarily associated with the Tariff that the Department stated will impact the Department's opinion regarding Verizon VT's 271 filing.
55. The Board approved the Tariff in its September 13, 2001, order in Docket 6553. The Board approved the Tariff without suspension pursuant to a recommendation of the Department. In the September 13 order, the Board opened an investigation into concerns raised by Adelphia in connection with the Tariff filing. That proceeding is ongoing. The Board has issued no decision concerning the Tariff. The Tariff remains in full force and effect.
56. In connection with Docket No. 6553, Verizon VT has held negotiations with the Department, Adelphia, and NECTA to review the issues the parties have raised in that proceeding. In addition, both the Department and NECTA have filed testimony in Docket 6553, and Verizon VT filed the reply testimony of Ms.